

ECF CASE  
JUDGE MARRERO

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

-----  
**J & J SPORTS PRODUCTIONS, INC.,**  
as Broadcast Licensee of the **November 4, 2006**  
**BALDOMIR/MAYWEATHER** Program,

Plaintiff,

-against-

**NOTICE OF MOTION FOR  
DEFAULT JUDGMENT**

Civil Action No.07-CV-3784-VM-MHD  
HON. VICTOR MARRERO

CAMILO ESTEVEZ-ESPINAL a/k/a CAMILO E.  
ESPINAL a/k/a CAMILO ESTEVEZ, Individually,  
and as officer, director, shareholder and/or principal  
of 4986 BROADWAY EL NUEVO AMBIENTE  
CORP. d/b/a EL NUEVO AMBIENTE  
RESTAURANT,

and

4986 BROADWAY EL NUEVO AMBIENTE  
CORP. d/b/a EL NUEVO AMBIENTE  
RESTAURANT

Defendants.

-----  
**PLEASE TAKE NOTICE** that upon the affirmation of Julie Cohen Lonstein, sworn to  
on the 26<sup>TH</sup> day of July 2007, in support of said application and the exhibits attached thereto,  
Plaintiff moves this Court for an order granting the entry of default judgment against the  
Defendants jointly and severally as follows:

**Against, CAMILO ESTEVEZ-ESPINAL a/k/a CAMILO E. ESPINAL a/k/a CAMILO  
ESTEVEZ, Individually, and as officer, director, shareholder and/or principal of 4986  
BROADWAY EL NUEVO AMBIENTE CORP. d/b/a EL NUEVO AMBIENTE  
RESTAURANT**

- 1) under 605(e)(3)(C)(i)(II) a sum *in the discretion of the Court*, of up to TEN THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum *in the discretion of the Court*, of up to ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for

Defendant's willful violation of 605(a)

3) and under 605(e)(3)(B)(iii) *in the discretion of the Court*, costs and Attorney fees of SIX HUNDRED SIX DOLLARS AND TWENTY FIVE CENTS (\$606.25) and further,

**Against, 4986 BROADWAY EL NUEVO AMBIENTE CORP. d/b/a EL NUEVO AMBIENTE RESTAURANT**

- 1) under 605(e)(3)(C)(i)(II) a sum *in the discretion of the Court*, of up to TEN THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum *in the discretion of the Court*, of up to ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for Defendant's willful violation of 605(a)
- 3) and under 605(e)(3)(B)(iii) *in the discretion of the Court*, costs and Attorney fees of SIX HUNDRED SIX DOLLARS AND TWENTY FIVE CENTS (\$606.25)

Dated: July 26, 2007  
Ellenville, NY 12428

LONSTEIN LAW OFFICE, P.C.

By: /s/ Julie Cohen Lonstein  
Julie Cohen Lonstein  
Bar Roll No. JL8521  
Attorney for Plaintiff  
1 Terrace Hill; PO Box 351  
Ellenville, NY 12428  
Telephone: 845-647-8500  
Facsimile: 845-647-6277